

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date: ??

Region: Raleigh Regional Office
County: Halifax
NC Facility ID: 4200007
Inspector's Name: Dawn Reddix
Date of Last Inspection: 05/31/2019
Compliance Code: 3 / Compliance - inspection

Facility Data Applicant (Facility's Name): WestRock Kraft Paper, LLC Facility Address: WestRock Kraft Paper, LLC 100 Gaston Road Roanoke Rapids, NC 27870 SIC: 2621 / Paper Mills Exc Building Paper NAICS: 322121 / Paper (except Newsprint) Mills Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			Permit Applicability (this application only) SIP: N/A NSPS: N/A NESHAP: N/A PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): N/A Other: N/A						
Contact Data			Application Data						
Facility Contact Mike Knudson Environmental Manager (252) 533-6280 100 Gaston Road Roanoke Rapids, NC 27870	Authorized Contact Benjamin White General Manager (252) 533-6335 100 Gaston Road Roanoke Rapids, NC 27870	Technical Contact Mike Knudson Environmental Manager (252) 533-6280 100 Gaston Road Roanoke Rapids, NC 27870	Application Number: 4200007.18C Date Received: 04/17/2018 Application Type: Modification Application Schedule: TV-Sign-501(b)(2) Part II Existing Permit Data Existing Permit Number: 01649/T65 Existing Permit Issue Date: 10/15/2019 Existing Permit Expiration Date: 02/28/2023						
Total Actual emissions in TONS/YEAR:									
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP		
2018	571.56	928.62	578.13	1087.05	171.60	203.38	145.81 [Methanol (methyl alcohol)]		
2017	326.57	986.51	600.13	964.37	179.22	253.05	208.39 [Methanol (methyl alcohol)]		
2016	54.79	1231.80	368.04	893.07	170.96	210.53	167.41 [Methanol (methyl alcohol)]		
2015	62.50	1335.78	322.76	739.13	239.52	152.15	108.89 [Methanol (methyl alcohol)]		
2014	72.13	1446.35	348.56	773.70	229.76	178.15	134.56 [Methanol (methyl alcohol)]		
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> Review Engineer: Brian Bland Review Engineer's Signature: Date: ?? </td> <td style="width: 50%; vertical-align: top;"> Comments / Recommendations: Issue 01649/T66 Permit Issue Date: ?? /2020 Permit Expiration Date: 02/28/2023 </td> </tr> </table>								Review Engineer: Brian Bland Review Engineer's Signature: Date: ??	Comments / Recommendations: Issue 01649/T66 Permit Issue Date: ?? /2020 Permit Expiration Date: 02/28/2023
Review Engineer: Brian Bland Review Engineer's Signature: Date: ??	Comments / Recommendations: Issue 01649/T66 Permit Issue Date: ?? /2020 Permit Expiration Date: 02/28/2023								

I. Introduction and Purpose of Application

Located in Roanoke Rapids, Halifax County, WestRock Kraft Paper, LLC (WestRock) formerly known as KapStone Kraft Paper is a pulp and paper mill that manufactures brown paper stock. Brown paper stock is used to make cardboard and shopping bags.

Application No. 4200007.18C was submitted to satisfy the 15A NCAC 02Q .0501(b)(2) (was 15A NCAC 02Q .0501(c)(2) at the time of issuance of the part I permit) requirement to submit a complete Title V Air Permit application within twelve (12) months after commencing operation for the emission sources in Application No. 4200007.17A. This application will be processed as the “second step” of two-step 15A NCAC 02Q .0501(b)(2) significant modification.

On February 8, 2017, the facility received their 1st step permit pursuant to the rules at 15A NCAC 02Q .0501(c)(2) and 02Q .0504 for the addition of an alternative operating scenario for MACT Subpart MM. As the review document for this applications contains a full discussion of the modification, and this information has not changed, these details will not be included as part of this review. However, a Word copy of the review document for Application No. 4200007.17A has been attached to this review.

II. Application Chronology

February 8, 2017	Air Permit No. 01649T60 for the addition of an alternative operating scenario for MACT Subpart MM was issued pursuant to Application No. 4200007.17A and included the following requirement: <i>For completion of the two-step significant modification process pursuant to 15A NCAC 02Q .0501(c)(2) or (d)(2), the Permittee shall file an amended application following the procedures of Section 15A NCAC 02Q .0500 within one year from the date of permit issuance for modification of these existing sources (ID Nos. ES-08-PU-012, ES-08-PU-013 and ES-09-PU-004).</i>
April 17, 2018	Application No. 4200007.18C to complete two-step significant modification process initiated with Application No. 4200007.17A was received.
April 23, 2018	The required application fee for Application No. 4200007.18C was received and this application is considered complete.
January 10, 2020	Draft permit and review document sent to the Raleigh Regional Office (RRO).
January 10, 2020	Draft permit forwarded to Mike Knudson and Matt Upton of WestRock.
January 21, 2020	WestRock responds that they have reviewed the draft permit and have no issues with it.
??, 2020	Draft permit sent to public notice and EPA review.
??, 2020	Public comment period ends.
??, 2020	EPA comment period ends.

III. Permit Modification/Changes

Page(s)	Section		Description of Change(s)
	Old	New	
All	All		Updated dates and permit revision number
3	Section 1		Removed **** footnote and associated emission source tags Updated minimum scrubber injection rate (ID Nos. 11-CD-001-001 and 11-CD-001-002) ¹
21-22	2.1 F.4.i 2.1 F.4.h 2.1 F.4.i	2.1 F.4.h 2.1 F.4.i 2.1 F.4.j	Corrected historical numbering errors
21	2.1 F.4.h	2.1 F.4.i	Removed remnants of BLS recordkeeping as this requirement was removed in Permit No. 01649T57
27	2.1 I.1.c	2.1 I.1.c	Updated minimum scrubbing liquid flow rate ¹
42	2.1 K.4.i	2.1 K.4.i	Corrected historical error "...2.1 K.4.g and i above" to "...2.1 K.4.g and h above"
60	2.2 A.1.g	2.2 A.1.g	Corrected historical error. The Total Organic Carbon (TOC) in lb/day to aerator horsepower (hp) in hp/day ratio (TOC/hp) shall be maintained <u>below</u> 24.6.
69	2.2 C. 4	N/A	Removed "15A NCAC 02Q .0504: OPTION FOR OBTAINING CONSTRUCTION AND OPERATION PERMIT" permit application requirement

¹ The minimum scrubbing liquid flow rate was updated from 1,560 gallons per minute (gpm) to 1,513 gpm based on stack testing performed July 12-13, 2016 (Tracking No. 2016-142ST, February 23, 2018 stack test review memorandum). WestRock initially requested this revised monitoring data be incorporated in their air permit in Application No. 2400036.17C.

IV. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 02D .0503 "Particulates from Fuel Burning Indirect Heat Exchangers"
15A NCAC 02D .0515 "Particulates from Miscellaneous Industrial Processes"
15A NCAC 02D .0516 "Sulfur Dioxide from Combustion Sources"
15A NCAC 02D .0521 "Control of Visible Emissions"
15A NCAC 02D .0524 "New Source Performance Standards" [Dc, DD]
15A NCAC 02D .0530 "Prevention of Significant Deterioration"
15A NCAC 02D .0614 "Continuous Assurance Monitoring"
15A NCAC 02D .1100 "Control of Toxic Air Pollutants"
15A NCAC 02D .1111 "Maximum Achievable Control Technology" [Subparts GGGG, ZZZZ, DDDDD]
15A NCAC 02D .1806 "Control and Prohibition of Odorous Emissions"
15A NCAC 02Q .0317 "Avoidance Conditions" [PSD]

As there are no changes to these regulatory requirements, a review of these regulations will not be included in this document.

V. Facility Compliance Status

The last full inspection of this facility was completed on May 31, 2019 by Dawn Reddix of the RRO. At that time, the facility "appeared to be operating in compliance with all permit requirements."

VI. Other Regulatory Concerns

A P.E. seal was not required for this application.

A zoning consistency form was not required for this modification.

An application fee of \$947 was required and received for this modification.

Halifax County has triggered increment tracking under PSD for PM₁₀, SO₂ and NO_x. However, no tracking is necessary for this modification as there is no change in emissions associated with this modification.

Public notice and EPA review is required for the completion of this two-step significant process. A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 02Q .0521 above. The associated dates are included in the Application Chronology in Section 3 above.

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date: February 8, 2017

Region: Raleigh Regional Office
County: Halifax
NC Facility ID: 4200007
Inspector's Name: Will Wike
Date of Last Inspection: 11/29/2016
Compliance Code: 3 / Compliance - inspection

<p align="center">Facility Data</p> <p>Applicant (Facility's Name): KapStone Kraft Paper Corporation</p> <p>Facility Address: KapStone Kraft Paper Corporation 100 Gaston Road Roanoke Rapids, NC 27870</p> <p>SIC: 2621 / Paper Mills Exc Building Paper NAICS: 322121 / Paper (except Newsprint) Mills</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>			<p align="center">Permit Applicability (this application only)</p> <p>SIP: NSPS: NESHAP: MACT MM PSD: PSD Avoidance: NC Toxics: 112(r): Other:</p>			
<p align="center">Contact Data</p> <table border="1"> <tr> <td> <p align="center">Facility Contact</p> <p>Mike Knudson Environmental Manager (252) 533-6280 PO Box 458 Roanoke Rapids, NC 27870</p> </td> <td> <p align="center">Authorized Contact</p> <p>Rob Kreizenbeck Vice President of Mill Operations (252) 533-6485 PO Box 458 Roanoke Rapids, NC 27870</p> </td> <td> <p align="center">Technical Contact</p> <p>Mike Knudson Environmental Manager (252) 533-6280 PO Box 458 Roanoke Rapids, NC 27870</p> </td> </tr> </table>			<p align="center">Facility Contact</p> <p>Mike Knudson Environmental Manager (252) 533-6280 PO Box 458 Roanoke Rapids, NC 27870</p>	<p align="center">Authorized Contact</p> <p>Rob Kreizenbeck Vice President of Mill Operations (252) 533-6485 PO Box 458 Roanoke Rapids, NC 27870</p>	<p align="center">Technical Contact</p> <p>Mike Knudson Environmental Manager (252) 533-6280 PO Box 458 Roanoke Rapids, NC 27870</p>	<p align="center">Application Data</p> <p>Application Number: 4200007.17A Date Received: 01/17/2017 Application Type: Modification Application Schedule: TV-Sign-501(c)(2) Part I Existing Permit Data Existing Permit Number: 01649/T59 Existing Permit Issue Date: 07/08/2016 Existing Permit Expiration Date: 12/31/2017</p>
<p align="center">Facility Contact</p> <p>Mike Knudson Environmental Manager (252) 533-6280 PO Box 458 Roanoke Rapids, NC 27870</p>	<p align="center">Authorized Contact</p> <p>Rob Kreizenbeck Vice President of Mill Operations (252) 533-6485 PO Box 458 Roanoke Rapids, NC 27870</p>	<p align="center">Technical Contact</p> <p>Mike Knudson Environmental Manager (252) 533-6280 PO Box 458 Roanoke Rapids, NC 27870</p>				

Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2015	62.50	1335.78	322.76	739.13	239.52	152.15	108.89 [Methanol (methyl alcohol)]
2014	72.13	1446.35	348.56	773.70	229.76	178.15	134.56 [Methanol (methyl alcohol)]
2013	400.71	1585.29	246.84	728.03	260.73	123.24	81.30 [Methanol (methyl alcohol)]
2012	818.21	1379.46	286.67	689.96	284.10	168.53	127.38 [Methanol (methyl alcohol)]
2011	880.80	1412.92	283.90	569.60	358.42	173.22	132.80 [Methanol (methyl alcohol)]

<p>Review Engineer: Brian Bland</p> <p>Review Engineer's Signature: <i>Original signed</i> Date: February 8, 2017</p>		<p align="center">Comments / Recommendations:</p> <p>Issue 01649/T60 Permit Issue Date: 02/08/2017 Permit Expiration Date: 12/31/2017</p>
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I. Facility Description

Located in Roanoke Rapids, Halifax County, KapStone Kraft Paper (KapStone) is a pulp and paper mill that manufactures brown paper stock. Brown paper stock is used to make cardboard and shopping bags

II. Purpose of Application

The purpose of this application is to add a MACT Subpart MM alternative operating scenario. Specifically, the individual single source filterable particulate emission limits will be added to the permit and the existing alternative “bubble” limits will remain. This proposed modification constitutes a significant modification of the Title V Air Quality Permit. This permit modification will be processed using the two-step significant modification procedures pursuant to 15A NCAC 02Q .0501(c)(2).

Additionally, the Division of Air Quality (DAQ) will administratively correct the requirement to reestablish the alternative MACT MM particulate matter (PM) limits based on increased black liquor solids (BLS) throughput in No. 7 Recovery Furnace. MACT MM requires only a notification of DAQ, not a reestablishment of PM limits, if BLS throughput during the most recent performance is exceeded by 10%.

III. Application Chronology

September 13, 2016	DAQ receives Permit Application No. 4200007.16C for a one-step significant modification.
January 17, 2017	Application No. 4200007.16C, consisting of a request to replace the alternative MACT MM compliance method with the single source compliance method, as well as changing source testing/operating parameter language, is withdrawn.
January 17, 2017	Application No. 4200007.17A is received.
January 31, 2017	Application fee for 4200007.17A is received and this application is considered administratively complete.
February 3, 2017	Draft permit forwarded to Michael Knudson of KapStone and Amy Marshall of AECOM.
February 3, 2017	Draft permit and review document forwarded to Raleigh Regional Office (RRO) for comments.
February 6, 2017	Michael Knudson responds that KapStone has no comments on the draft.
February 7, 2017	Charles McEachern responds that the drafts look fine and RRO recommends issuance of the permit.

IV. Changes to Existing Air Permit

Page(s)	Section	Description of Change(s)
All	All	Update dates and permit revision number
3 – end	All	Update permit revision number in header
10	Permitted Items	Correct ID Nos. in footnote *** Add footnote **** and tag associated emission sources
65	Table 2.2 C	Update table to reflect emissions limits of both the Primary Operating Scenario (POS) and Alternate Operating Scenario (AOS)

Page(s)	Section	Description of Change(s)
N/A	2.2 C.1.b (T59)	Remove 35 percent opacity paragraph for No. 7 Recovery Furnace from the Emission Limits section. Note: Item 2.2 C.1. j, in the Monitoring section, includes a more detailed description of the 35 percent opacity requirement that will remain unchanged
66	2.2 C.1.b	Add single source PM limits from Subpart MM [40 CFR 63.862(a)(1)(i)] as Primary Operating Scenario
66	2.2 C.1.c	Label existing alternative [40 CFR 63.862(a)(1)(ii)] limits as Alternate Operating Scenario
66	2.2 C.1.e	Update wording to accommodate two operating scenarios
68	2.2 C.1.q	Remove historical error that required recalculation of the overall PM emissions limit if the Permittee "...increases the black liquor solids firing rate for the No. 7 Recovery Furnace during any 24-hour averaging period by more than 10 percent above the level measured during the most recent performance test..." Update permit language
69	2.2 C. 3	Add "15A NCAC 02Q .0508(j): ALTERNATIVE OPERATING SCENARIOS" recordkeeping requirement
69	2.2 C. 4	Add "15A NCAC 02Q .0504: OPTION FOR OBTAINING CONSTRUCTION AND OPERATION PERMIT" permit application requirement

V. Compliance Status

The last full compliance inspection was on July 13, 2016 when the facility was inspected by Mr. Will Wike of the RRO. Based on observations made during the inspection, KapStone Kraft Paper appeared to be operating in compliance with all permit requirements.

VI. Regulatory Review

Alternate Operating Scenario

As described in the application: "The mill's No. 7 Recovery Furnace, No. 7 Smelt Dissolving Tank, and Lime Kiln are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Chemical Recovery Combustion Sources at Kraft Pulp Mills (40 CFR 63, Subpart MM). This regulation sets out filterable PM emission standards to limit emissions of metal HAP. The Roanoke Rapids Mill currently complies with the rule using the alternate procedure for establishing an overall chemical recovery system emission limit in 63.862(a)(1)(ii) and individual emission limits under 63.865(a). This methodology is commonly referred to as the "bubble" approach because the sources under the bubble can be over- or under-controlled as long as the total system emission limit is equivalent to the combined "single source" limits in 63.862(a)(1)(i)."

KapStone has requested the single source limits be added to permit while retaining the existing "bubble" limits as an alternative operating scenario. Under the "bubble" limit, total particulate matter emissions from the three sources cannot exceed 1.379 lb/TBLS, but there is no overall limit associated with the single source limits. A summary table of the individual limits is provided below. It should be noted that the No. 7 Recovery Furnace has a 15A NCAC 02D .0530 BACT limit of 0.021 gr/dscf (see Section 2.1 F of Air Permit No. 01649T60). Additionally, although the units changed on the No. 7 Smelt Tank emission limit, based on the operating conditions in the Initial Performance Test (IPT), these PM limits are basically equivalent (see the April 28, 2006 source test memorandum associated with the January 2005 test for related calculations).

Subpart MM PM limits for chemical recovery sources

Emission Source	Existing Limit	Single Source Limit
Lime Kiln	0.14 gr/dscf	0.064 gr/dscf
No. 7 Recovery Furnace	0.021 gr/dscf	0.044 gr/dscf
No. 7 Smelt Tank	0.094 gr/dscf	0.20 lb/TBLS

Removal of reestablishment of NESHAP Subpart MM PM limits

The facility's air permit has historically contained a requirement that the alternative PM emissions limits be reestablished if the BLS throughput exceeded the IPT BLS throughput by more than 10%. However, Subpart MM doesn't require a reestablishment of the limits due to BLS throughput exceeding the IPT BLS throughput by more than 10%. 40 CFR 63.862(a)(1)(ii)(D) requires reestablish the emissions limits if "The air pollution control system for any existing kraft or soda recovery furnace, smelt dissolving tank, or lime kiln for which an emission limit was established ... is modified ... or replaced" or "Any kraft or soda recovery furnace, smelt dissolving tank, or lime kiln for which an emission limit was established ... is shut down for more than 60 consecutive days." Meanwhile, 40 CFR 63.867(b)(3) requires a notification if above described actions take place as well as if "A continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit is changed" or "The black liquor solids firing rate for any kraft or soda recovery furnace during any 24-hour averaging period is increased by more than 10 percent above the level measured during the most recent performance test."

VII. Recent Permit History

July 8, 2016 - Permit No. 01649T59 issued. Modifications included: (1) Application No. 4200007.16A submitted on March 10, 2016 to revise the 112(j) Case-by-Case HAP limits for No. 1 Power Boiler (ID No. ES-11-CU-001) and (2) Application No. 4200007.16B submitted on May 3, 2016 to remove the 15A NCAC 02D .1404 requirements from Section 2.1 I of the air permit. This modification was using the one-step significant modification procedures pursuant to 15A NCAC 02Q .0501(d)(2).

June 6, 2016 - Permit No. 01649T58 issued pursuant to Application No. 4200007.15B to revise the tune-up frequency, from annually to every five years, for No. 4 Package Boiler (ID No. ES-11-CU-035) because it uses an automatic oxygen trim system to maintain excess air at the desired level.

April 6, 2016 - Permit No. 01649T57 issued pursuant to Application No. 4200007.15E to revise the monitoring required for compliance with the existing No. 7 Recovery Furnace BACT limits.

March 8, 2016 - Permit No. 01649T56 issued pursuant to Application No. 4200007.15D. The purpose of this application was to reconfigure the woodyard.

August 27, 2015 - Permit No. 01649T55 issued pursuant to Application Nos. 4200007.14B, 4200007.14C and 4200007.15A. The purpose of this application was to: revise the minimum flow rate of the two scrubbers installed on No. 1 Power Boiler (.14B), update the PSD Avoidance Condition pH-SO₂ removal efficiencies emission factors (.14C), and remove the CAIR NO_x limit from the air permit is based on the reversal of the vacature of the Cross-State Air Pollution Rule (CSAPR) rule (.15A).

September 4, 2013 - Permit No. 01649T54 issued pursuant to Application No. 4200007.13B. This permitting event was a 02Q .0501(d)(1) modification to the existing Title V permit, and thus satisfying the requirements both in 15A NCAC 02D .0530 "Prevention of Significant Deterioration" and 15A NCAC 02Q .0500 "Title V Procedures".

January 10, 2013 - Permit No. 01649T53 issued pursuant to Application No. 4200007.11A. This application was for the renewal of KapStone's Title V air quality permit.

June 14, 2012 - Permit No. 01649T52 issued pursuant to Application No. 4200007.12A. The purpose of this application was to install a temporary enclosed flare.

April 30, 2012 - Permit No. 01649T51 issued pursuant to Application No. 4200007.12B. The purpose of this application was a minor modification to increase pulp and paper production capacity through mechanical changes to several existing processes.

March 30, 2012 - Permit No. 01649T50 issued pursuant to Application No. 4200007.11B. The purpose of this application was a significant modification to add one natural gas/distillate fuel-fired boiler with a maximum heat input of 245 million Btu per hour to produce steam for energy generation and provide heat for the pulp and paper processes.

December 21, 2011 - Permit No. 01649T49 issued pursuant to Application No. 4200007.11C. The purpose of this application was a minor modification to add a diesel-fired portable bark grinder with a 1,200 hp maximum rating which will be used to process bark into fuel.

February 21, 2011 - Permit No. 01649T48 issued pursuant to Application No. 4200007.09D. The purpose of this application was a Part 2 MACT "Hammer" application for seven existing boilers.

August 10, 2010 - Permit No. 01649T47 issued pursuant to Application No. 4200007.10B. The purpose of this application was a minor modification to add natural gas to the list of fuels that can be fired in the lime kiln.

June 23, 2010 - Permit No. 01649T46 issued pursuant to Application No. 4200007.10A. The purpose of this application was a minor modification to revise Specific Condition 2.1 M.3 to use specific NOx emission factors for each engine(s) if available, AP-42 otherwise, used by the Porta Chipper (ES-01-PU-014).

November 13, 2009 - Permit No. 01649T45 issued pursuant to Application No. 4200007.09E. The purpose of this application was to administratively correct the annualized BLS firing rate from 547,000 tons per year to 584,000 tons per year.

June 16, 2009 - Permit No. 01649T44 issued pursuant to Application No. 4200007.09C. The purpose of this application was to add the ability to utilize petroleum coke (petcoke) as a fuel for the lime kiln.

February 13, 2009 - Permit No. 01649T43 issued pursuant to Application No. 4200007.09B. The purpose of this application was a minor modification to add the capability to burn ultra-low sulfur (ULS) No. 2 fuel oil with black liquor solids (BLS) as a fuel for the No. 7 recovery furnace.

October 18, 2008 - Permit No. 01649T42 issued pursuant to Application No. 4200007.08A. The purpose of this application was a minor modification for the addition of a portable log chipper.

September 12, 2007 - Permit No. 01649T41 issued pursuant to Application No. 4200007.07B. This application was for an Administrative Amendment to remove the Boiler MACT standard from the Air Permit at the request of the facility. On June 8, 2007, the United States Court of Appeals for the District of Columbia Circuit issued a decision vacating in its entirety and remanding the NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters, or Boiler MACT, contained in 40 CFR 63 Subpart DDDDD.

July 23, 2007 - Permit No. 01649T40 issued pursuant to Application No. 4200007.07A. The purpose of this application was to incorporate enforceable conditions pertaining to the emissions and health-related impact of manganese from two distillate and residual-fired boilers and a coal, woodwaste, residual oil-fired boiler.

March 30, 2007 (with an effective date of April 16, 2007) - Permit No. 01649T39 issued pursuant to Application No. 4200007.05C. Although the initial Title V permit (Permit No. 01649T34) was previously issued, it was adjudicated by KapStone. The purpose of this application is to update the initial Title V Permit and add any additional language necessary for emission standards whose compliance dates are subsequent to the initial Title V permit.

VIII. Recommendation

The NC DAQ recommends the issuance of Air Permit No. 01649T60 for KapStone Kraft Paper Corporation located in Roanoke Rapids, Halifax County, NC.

DRAFT